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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

1597 ASHFIELD VALLEY TRUST, a Nevada Trust;) CASE NO. 2:14-cv-2123-JCM-GWF
DAVID TOTH and SIRWAN TOTH, Trustees,)

Plaintiffs,)

vs.)

FEDERAL NATIONAL MORTGAGE)
ASSOCIATION SYSTEM, a Delaware Association;)
VENTA FINANCIAL GROUP, INC., a Nevada)
Corporation; OSCAR MORENO, an Individual;)
DOES, 1 through 25 inclusive; and ROE)
CORPORATIONS, I through X, inclusive,)

Defendants.)

**STIPULATION TO EXTEND
BRIEFING ON
COUNTERMOTION FOR
SUMMARY JUDGMENT (ECF
NO. 96]**

(First Request)

FEDERAL NATIONAL MORTGAGE)
ASSOCIATION SYSTEM,)

Counterclaimant,)

vs.)

1597 ASHFIELD VALLEY TRUST, a Nevada Trust;)
DAVID TOTH and SIRWAN TOTH, Trustees;)
HIDDENCREST/PARKHURST COMMUNITY)
ASSOCIATION, a Nevada non-Profit Corporation;)
and ABSOLUTE COLLECTION SERVICES, LLC, a)
Nevada Limited-Liability Company,)

Counterdefendants.)

**STIPULATION TO EXTEND BRIEFING ON COUNTERMOTION FOR SUMMARY
JUDGMENT (ECF NO. 96)**

(First Request)

Pursuant to Local Rules 6-1 and 7-1, the parties, by and through their attorneys of record, submit the following stipulation for the Court's review and approval.

1. On October 16, 2015, this Court issued an order setting November 16, 2015 as the deadline to file further motions for summary judgment. ECF No. 84.

2. On December 10, 2015, Oscar Moreno file an opposition to a motion for summary judgment filed by several defendants. ECF No. 96.

3. Moreno's opposition contained a countermotion for summary judgment. ECF No. 96.

4. The parties believe that Moreno's countermotion for summary judgment complies with the Court's October 16, 2015 Order, but to the extent this Court considers Moreno's countermotion for summary judgment as untimely under the October 16, 2015 order, the parties agree that this Court should grant Moreno leave to file the countermotion for summary judgment (ECF No. 96) because the parties desire to have all remaining claims and issues resolved by motion so necessary appeals may proceed.

5. The parties also agree that they should be afforded the same timeline set forth in Local Rule 7-2 to file responses and replies to Moreno's countermotion for summary judgment.

6. Therefore, any responses to Moreno's countermotion for summary judgment (ECF No. 96) must be filed and served by January 8, 2016.

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2 7. Any replies to responses to Moreno's counter-motion for summary judgment (ECF
3 No. 96) must be filed and served in accordance with Local Rule 7-2(e) or January 25, 2015.

4 DATED: January 4, 2016.

DATED: January 4, 2016.

5 FENNEMORE CRAIG

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/s/ Ashlie L. Surur

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10 DATED: January 4, 2016.

DATED: January 4, 2016.

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CHARLES L. GEISENDORF, LTD.

12 /s/ Laurel I. Handley

/s/ Charles L. Geisendorf

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16 DATED: January 4, 2016.

DATED: January 4, 2016.

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23 IT IS SO ORDERED:

24 James C. Mahan
25 UNITED STATES DISTRICT JUDGE

26 DATED: January 6, 2016
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